

Exhibit 1

Proposed Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

)

) Chapter 9

)

) Case No. 13-53846

)

) Hon. Steven W. Rhodes

)

ORDER GRANTING MOTION FOR PROTECTIVE ORDER

This matter having come before the Court on the motion of Syncora for a protective order (the “Motion for Protective Order”), the Court having reviewed Syncora’s Motion for Protective Order; and the Court having determined that the legal and factual bases set forth in the Motion for Protective Order establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. Syncora’s Motion for Protective Order is GRANTED.
2. The term “Confidential Information” as used herein means any and all nonpublic proprietary and/or commercially-sensitive information concerning Syncora (including, without limitation, accounting, financial, developmental, and operational information) furnished to the City during the course of the Bankruptcy Case. All Confidential Information produced by Syncora to the City shall be marked “CONFIDENTIAL” by Syncora.

3. The term Confidential Information does not include information that is (a) already in the City's possession or (b) is or becomes generally available to the public on a non-confidential basis.

4. All Confidential Information shall be used solely in connection with the Bankruptcy Case, will be kept confidential by the City, and will not be disclosed to any third party, except as otherwise provided herein.

5. The City may disclose Confidential Information only to its attorneys, its experts, and those City employees and witnesses that the attorneys deem necessary to review the Confidential Information. Each person to whom the City discloses Confidential Information shall first be shown a copy of this Order and shall be further advised of the obligation to honor the confidentiality designation.

6. If the City attempts to use Confidential Information in connection with a filing, it must file the information under seal pursuant to ECF Procedure 9.

7. To the extent that Syncora otherwise consents in writing, the City may disclose the Confidential Information to a third party.

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IT IS SO ORDERED.

STEVEN W. RHODES
United States Bankruptcy Judge